DOCKET NO. D-1979-026-2

DELAWARE RIVER BASIN COMMISSION

ArcelorMittal Plate, LLC
Conshohocken Industrial Wastewater Treatment Plant
Plymouth Township, Montgomery County, Pennsylvania

PROCEEDINGS

This docket is issued in response to an Application submitted to the Delaware River Basin Commission (DRBC or Commission) by ArcelorMittal Plate, LLC (ArcelorMittal) on June 10, 2010 (Application), for modification of an industrial wastewater treatment plant (IWTP) approval. National Pollutant Discharge Elimination System (NPDES) Permit No. PA0050326 for the project IWTP was issued by the Pennsylvania Department of Environmental Protection (PADEP), effective date July 1, 2012.

The Application was reviewed for approval under Section 3.8 of the *Delaware River Basin Compact*. The Montgomery County Planning Commission has been notified of pending action. A public hearing on this project was held by the DRBC on July 11, 2012.

A. DESCRIPTION

1. Purpose. The purpose of this docket is to modify the DRBC approval of the existing 1.2 million gallons per day (mgd) ArcelorMittal IWTP, including updating the approval to reflect the current facility description. The IWTP, which treats process industrial wastewater and contact and non-contact cooling water from steel production and finishing operations at the ArcelorMittal Plate facility in Conshohocken, was previously approved by the DRBC via Docket No. D-1979-026-1 on July 25, 1979. No modifications to the IWTP are proposed.

2. Location. The ArcelorMittal facility is located between Conshohocken Road and the Schuylkill River, just south of a railroad bridge owned by the docket holder that spans the Schuylkill River, in Plymouth Township, Montgomery County, Pennsylvania. The IWTP will continue to discharge to the Schuylkill River at River Mile 92.47 – 21.5 (Delaware River – Schuylkill River).

The IWTP outfall is located in the Schuylkill River Watershed as follows:

OUTFALL NO.	LATITUDE (N)	LONGITUDE (W)
	40° 05' 22"	75° 19' 15"

3. **Area Served**. The docket holder's IWTP will continue to receive industrial wastewater and cooling water flows from the steel production and finishing operations at the ArcelorMittal Plate Conshohocken facility.

For the purpose of defining the Area Served, Section B (Type of Discharge) and D (Service Area) of the docket holder's Application are incorporated herein by reference, to the extent consistent with all other conditions contained in the DECISION Section of this docket.

4. **Physical Features**.

a. **Design Criteria**. The ArcelorMittal Plate facility produces finished carbon, alloy, and stainless steel plates from slab stock at a hot rolling mill and heat production facilities located on-site. The ArcelorMittal IWTP, designed for an average annual flow of 1.2 mgd, treats process industrial wastewater and contact and non-contact cooling water used for slab surface descaling and non-contact cooling at the hot rolling mill, and contact cooling at the heat production facilities. The cooling water is combined with process water prior to treatment. The treatment processes include 1) oil skimming of the top of a concentrator; 2) coagulant (ferric chloride) and flocculent (cationic polymer) addition for settling; 3) decanting off the top of the clarifier; and 4) sludge conditioning through lime slurry addition and sludge dewatering through a filter press. Filtrate from the sludge filtering is returned to the influent stream.

b. **Facilities**. The IWTP consists of a river pump house, a 125-foot diameter clarifier which receives both Schuylkill River water and process wastewater, a recirculation pump house, an oil separator, a scale pit, a sludge lagoon and ancillary equipment.

The project facilities are not located in the 100-year floodplain.

Wasted sludge will continue to be hauled off-site by a licensed hauler for disposal at a (State-approved) facility.

c. **Water withdrawals**. The water withdrawal for the use of process water and contact cooling and non-contact cooling is from one (1) surface water intake located on the Schuylkill River and one (1) on-site groundwater well, both owned and operated by the docket holder. The surface and groundwater withdrawals are is described in detail in Docket No. D-2009-039-1, which was approved on July 14, 2010.

d. **NPDES Permit / DRBC Docket**. The PADEP issued NPDES Permit No. PA0050326, effective date July 1, 2012, which includes final effluent limitations for the project discharge of 1.2 mgd to surface waters classified by the PADEP as warm water fishery (WWF). The following average monthly effluent limits are among those listed in the NPDES Permit and meet or are more stringent than the effluent requirements of the DRBC.

EFFLUENT TABLE A-1: DRBC Parameters Included in NPDES Permit

OUTFALL 001 (Schuylkill River)		
PARAMETER	**LIMIT**	**MONITORING**
pH (Standard Units)	6 to 9 at all times	As required by NPDES Permit
Total Suspended Solids	30 mg/l	As required by NPDES Permit
Color	Monitor & Report	As required by NPDES Permit
Total Dissolved Solids *	Monitor & Report	As required by NPDES Permit
Temperature	110 ^{o} F (Max)	As required by NPDES Permit

* See Condition II.p. in the Decision section

EFFLUENT TABLE A-2: DRBC Parameters Not Included in NPDES Permit

OUTFALL 001 (Schuylkill River)		
PARAMETER	**LIMIT**	**MONITORING**
Ammonia Nitrogen*	Monitor & Report	Monthly*

* See Condition II.q. in the Decision section

B. FINDINGS

The purpose of this docket is to modify the DRBC approval of the docket holder's existing 1.2 mgd IWTP, including updating the approval to reflect the current facility description. The project IWTP was originally approved by the DRBC via Docket No. D-1979-026-1 on July 25, 1979. Docket No. D-1979-026-1 approved an average annual design flow of 1.99 mgd IWTP and did not specify effluent limits for the IWTP discharge. This docket (Docket No. D-1979-026-2) updates the facility description to reflect an annual average flow of 1.2 mgd (as opposed to 1.99 mgd as indicated in Docket No. D-1979-026-1). This docket also sets forth effluent limits for the IWTP discharge, and provides conditions for the operation of the IWTP and IWTP discharge of treated effluent to the Schuylkill River.

Near the project site, the Schuylkill River has an estimated seven day low flow with a recurrence interval of ten years (Q7-10) of 194 mgd (300 cfs). The ratio of this low flow to the average design waste water discharge from the IWTP is 162 to 1.

The nearest surface water intake of record for public water supply downstream of the project discharge is operated by the City of Philadelphia Water Department (PWD). PWD's Queen Lane intake is located on the Schuylkill River, approximately nine river miles downstream.

The limits in the NPDES Permit are in compliance with Commission effluent quality requirements, where applicable.

The project is designed to produce a discharge meeting the effluent requirements as set forth in the Water Quality Regulations of the DRBC.

The project does not conflict with the Comprehensive Plan and is designed to prevent substantial adverse impact on the water resources related environment, while sustaining the current and future water uses and development of the water resources of the Basin.

C. DECISION

I. Effective on the approval date for Docket No. D-1979-026-2 below, DRBC Docket No. D-1979-026-1 is terminated and replaced by Docket No. D-1979-026-2 to the extent that it is not included in Docket No. D-1979-026-1.

II. The project and appurtenant facilities as described in the Section A "Physical Features" of this docket are approved pursuant to Section 3.8 of the *Compact*, subject to the following conditions:

a. Docket approval is subject to all conditions, requirements, and limitations imposed by the PADEP in its NPDES permit, and such conditions, requirements, and limitations are incorporated herein, unless they are less stringent than the Commission's.

b. The facility and operational records shall be available at all times for inspection by the DRBC.

c. The facility shall be operated at all times to comply with the requirements of the *Water Quality Regulations* of the DRBC.

d. The docket holder shall comply with the requirements contained in the Effluent Table(s) in Section A.4.d. of this docket. The docket holder shall submit the required monitoring results directly to the DRBC Project Review Section. The monitoring results shall be submitted annually, absent any observed limit violations, by January 31. If a DRBC effluent limit is violated, the docket holder shall submit the result(s) to the DRBC within 30 days of the violation(s) and provide a written explanation that states the action(s) the docket holder has taken to correct the violation(s) and protect against any future violations.

e. Except as otherwise authorized by this docket, if the docket holder seeks relief from any limitation based upon a DRBC water quality standard or minimum treatment requirement, the docket holder shall apply for approval from the Executive Director or for a docket revision in accordance with Section 3.8 of the *Compact* and the *Rules of Practice and Procedure*.

f. If at any time the receiving treatment plant proves unable to produce an effluent that is consistent with the requirements of this docket approval, no further connections shall be permitted until the deficiency is remedied.

g. Nothing herein shall be construed to exempt the docket holder from obtaining all necessary permits and/or approvals from other State, Federal or local government agencies having jurisdiction over this project.

h. The discharge of wastewater shall not increase the ambient temperatures of the receiving waters by more than 5°F, nor shall such discharge result in stream temperatures exceeding 87°F. (Non-tidal, Non-trout Waters)

i. The docket holder is permitted to treat and discharge wastewaters as set forth in the Area Served Section of this docket, which incorporates by reference Sections B (Type of Discharge) and D (Service Area) of the docket holder's Application to the extent consistent with all other conditions of this DECISION Section.

j. The docket holder shall make wastewater discharge in such a manner as to avoid injury or damage to fish or wildlife and shall avoid any injury to public or private property.

k. Nothing in this docket approval shall be construed as limiting the authority of DRBC to adopt and apply charges or other fees to this discharge or project.

l. The issuance of this docket approval shall not create any private or proprietary rights in the waters of the Basin, and the Commission reserves the right to amend, suspend or rescind the docket for cause, in order to ensure proper control, use and management of the water resources of the Basin.

m. A complete application for the renewal of this docket, or a notice of intent to cease the operations (withdrawal, discharge, etc.) approved by this docket by the expiration date, must be submitted to the DRBC at least six (6) months prior to the expiration date below (unless permission has been granted by the DRBC for submission at a later date), using the appropriate DRBC application form. In the event that a timely and complete application for renewal has been submitted and the DRBC is unable, through no fault of the docket holder, to reissue the docket before the expiration date below, the terms and conditions of this docket will remain fully effective and enforceable against the docket holder pending the grant or denial of the application for docket approval.

n. The Executive Director may modify or suspend this approval or any condition thereof, or require mitigating measures pending additional review, if in the Executive Director's judgment such modification or suspension is required to protect the water resources of the Basin.

o. Any person who objects to a docket decision by the Commission may request a hearing in accordance with Article 6 of the Rules of Practice and Procedure. In accordance with Section 15.1(p) of the Delaware River Basin Compact, cases and controversies arising under the Compact are reviewable in the United States district courts.

p. The docket holder may request of the Executive Director in writing the substitution of specific conductance for TDS. The request should include information that supports the effluent specific correlation between TDS and specific conductance. Upon review, the Executive Director may modify the docket to allow the substitution of specific conductance for TDS monitoring.

q. After six (6) months of monthly sampling for Ammonia-Nitrogen, the docket holder may request of the Executive Director in writing to modify the required Ammonia-Nitrogen monitoring contained within this docket approval. Upon review, the Executive Director may modify the docket to reduce or eliminate the Ammonia-Nitrogen monitoring requirements contained in Effluent Table A-2 in Section A.4.d. of this docket.

BY THE COMMISSION

DATE APPROVED: **July 11, 2012**

EXPIRATION DATE: **June 30, 2017**